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Proposed Attorneys for Elissa D. Miller,  
Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**LOS ANGELES DIVISION**

In re  
GIRARDI KEESE,

Debtor.

Case No. 2:20-bk-21022-BR

Chapter 7

**NOTICE OF HEARING ON EMERGENCY  
MOTION FOR ORDER:**

**(1) APPROVING COMPROMISE WITH  
FRANTZ LAW GROUP, APLC  
PURSUANT TO FEDERAL RULE OF  
BANKRUPTCY PROCEDURE 9019;**

**(2) AUTHORIZING THE ASSIGNMENT  
OF THE ESTATE'S INTERESTS IN THE  
SOUTHERN CALIFORNIA GAS LEAK  
LITIGATION FREE AND CLEAR OF  
LIENS, CLAIMS AND INTERESTS  
PURSUANT TO 11 U.S.C. § 363; AND**

**(3) AUTHORIZING REJECTION OF THE  
ASSUMPTION AND LIEN AGREEMENT  
BETWEEN THE DEBTOR AND ABIR  
COHEN TREYZON SALO LLP  
PURSUANT TO 11 U.S.C. § 365**

Date: February 2, 2021  
Time: 10:00 a.m.  
Ctrm.: 1668 via ZoomGov  
255 E. Temple Street  
Los Angeles, CA 90012

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Web Address:

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Meeting ID: 1614873359

Password: 123456

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(San Jose)  
1 (646) 828 7666 US  
(New York)

**TO ALL INTERESTED PARTIES:**

**PLEASE TAKE NOTICE** that on January 25, 2021, Elissa D. Miller, the Chapter 7 Trustee (the "Trustee") for the bankruptcy estate of Girardi Keese, filed an *Emergency Motion for Order: (1) Approving Compromise with Frantz Law Group, APLC Pursuant to Federal Rule of Bankruptcy Procedure 9019; (2) Authorizing the Assignment of the Estate's Interests in the Southern California Gas Leak Litigation Free and Clear of Liens, Claims and Interests Pursuant to 11 U.S.C. § 363; and (3) Authorizing Rejection of the Assumption and Lien Agreement Between the Debtor and Abir Cohen Treyzon Salo LLP Pursuant to 11 U.S.C. § 365* (the "Motion") [Docket No. 123]. Also on January 25, 2021, the Trustee served a copy of the Motion on all interested parties. On January 26, 2021, the Court entered an order setting a hearing on the Motion (the "Order") [Docket No. 125].

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Order, a hearing on the Motion will take place on **February 2, 2021 at 10:00 a.m.** The hearing on the Motion shall be conducted via videoconference on Zoom for Government. Participants in the hearing will be connected with Courtroom 1668 via Zoom for Government but will not be physically present in the Courtroom. The information to appear via videoconference is in the above caption.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Order, written opposition(s) to the Motion shall be filed no later than **10:00 a.m. on Friday, January 29, 2021**. Written reply(ies) to the Motion shall be filed no later than **12:00 p.m. on Monday, February 1, 2021**.

**FOR FURTHER INFORMATION**, please see the Motion which is available from the Court, the Pacer docket, or by contacting counsel for the Trustee in the above caption.

**PLEASE TAKE FURTHER NOTICE** that failure to timely file and serve an opposition to the Motion may be deemed by the Court to be consent to the granting of the relief requested in the Motion.

DATED: January 26, 2021

SMILEY WANG-EKVALL, LLP

By: /s/ Lei Lei Wang Ekvall

LEI LEI WANG EKVALL

Proposed Attorneys for Elissa D. Miller,  
Chapter 7 Trustee

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 3200 Park Center Drive, Suite 250, Costa Mesa, CA 92626.

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF HEARING ON EMERGENCY MOTION FOR ORDER: (1) APPROVING COMPROMISE WITH FRANTZ LAW GROUP, APLC PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019; (2) AUTHORIZING THE ASSIGNMENT OF THE ESTATE'S INTERESTS IN THE SOUTHERN CALIFORNIA GAS LEAK LITIGATION FREE AND CLEAR OF LIENS, CLAIMS AND INTERESTS PURSUANT TO 11 U.S.C. § 363; AND (3) AUTHORIZING REJECTION OF THE ASSUMPTION AND LIEN AGREEMENT BETWEEN THE DEBTOR AND ABIR COHEN TREYZON SALO LLP PURSUANT TO 11 U.S.C. § 365 MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF ELISSA D. MILLER IN SUPPORT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) January 26, 2021 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) January 26, 2021, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Honorable Barry Russell  
U.S. Bankruptcy Court  
Roybal Federal Building  
255 E. Temple Street, Suite 1660  
Los Angeles, CA 90012

☐ Service information continued on attached page.

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) January 26, 2021, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 26, 2021

*Date*

Gabriela Gomez-Cruz

*Printed Name*

/s/ Gabriela Gomez-Cruz

*Signature*

**ADDITIONAL SERVICE INFORMATION (if needed):**

**1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")**

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- Timothy J Yoo tjy@lnbyb.com

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**

**Via E-mail:**

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